

**UNITED STATES COURT
DISTRICT OF NEW JERSEY**

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 467-2700
Fax: (973) 467-8126
*Local Counsel to the Official Committee of
Talc Claimants*

BROWN RUDNICK LLP

David J. Molton, Esq.
Robert J. Stark, Esq.
Michael S. Winograd, Esq.
Eric R. Goodman, Esq.
dmolton@brownrudnick.com
rstark@brownrudnick.com
mwinograd@brownrudnick.com
egoodman@brownrudnick.com
Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
Fax: (212) 209-4801
and
Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
Fax: (617) 856-8201
*Co-Counsel for the Official Committee of
Talc Claimants*

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
Bret Vallacher, Esq.
jmassey@masseygail.com
bvallacher@masseygail.com
1000 Maine Ave. SW, Suite 450
Washington, DC 20024
Tel: (202) 652-4511
Fax: (312) 379-0467
*Special Counsel for the Official Committee of
Talc Claimants*

OTTERBOURG P.C.

Melanie L. Cyganowski, Esq.
Richard G. Haddad, Esq.
Adam C. Silverstein, Esq.
Jennifer S. Feeney, Esq.
David A. Castleman, Esq.
mcyganowski@otterbourg.com
rhaddad@otterbourg.com
asilverstein@otterbourg.com
jfeeney@otterbourg.com
dcastleman@otterbourg.com
230 Park Avenue
New York, NY 10169
Tel: (212) 661-9100
Fax: (212) 682-6104
*Co-Counsel for Official Committee of Talc
Claimants*

In re: LTL MANAGEMENT, LLC,¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan
THE OFFICIAL COMMITTEE OF TALC CLAIMANTS Appellant, v. LTL MANAGEMENT LLC, Appellee.	Case No.: 23-02918 (MAS)

**NOTICE OF MOTION FOR AN ORDER
ADMITTING BRET R. VALLACHER TO APPEAR *PRO HAC VICE***

TO: PARTIES ON THE COURT’S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that on August 7, 2023 at 10:00 a.m. or as soon thereafter as counsel may be heard, The Official Committee of Talc Claimants (“Appellant”) shall apply, pursuant to Local Civil Rule 101.1(c), before the Honorable Judge Michael A. Shipp, United States District Court for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 5W, Trenton, NJ 08608, for entry of an Order admitting Bret R. Vallacher, Esq., of the law firm Massey & Gail LLP, co-counsel for Appellant in this proceeding, *Pro Hac Vice* on behalf of Appellant in the pending matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Appellant will rely upon the declarations of Daniel M. Stolz and Bret R. Vallacher submitted herewith.

PLEASE TAKE FURTHER NOTICE that Appellant does not request the opportunity to present oral argument in support of this Motion.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE FURTHER NOTICE that a proposed order granting the relief requested is submitted herewith.

Dated: July 6, 2023

Respectfully submitted,

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz

Daniel M. Stolz, Esq.

110 Allen Road, Suite 304

Basking Ridge, NJ 07920

*Counsel for the Official Committee of Talc
Claimants*